

JUDGE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	NO. CR15-029RAJ
)	
Plaintiff,)	
)	MOTION FOR EARLY
v.)	TERMINATION OF
)	SUPERVISED RELEASE
BRIAN RICHARD FARRELL,)	
)	Noted for: July 15, 2022
Defendant.)	

Brian Richard Farrell, through his attorney, Assistant Federal Public Defender Nancy Tenney, moves this Court for an order granting early termination of supervised release, pursuant to 18 U.S.C. § 3583(e)(1), given Mr. Farrell's conduct while on supervision and in the interest of justice.

After a person has completed one year of supervised release, a court may terminate the remainder of the term of supervised release after considering the factors set out in 18 U.S.C. §§ 3553(a)(1), (a)(2)(B)-(D), and (a)(4)-(7) if the court is satisfied that early termination is warranted given the defendant's conduct and in the interest of justice. Early termination is warranted in this case in light of Mr. Farrell's performance during his supervision.

On June 3, 2016, Mr. Farrell was sentenced by this Court to 96 months imprisonment and four years of supervised release after pleading guilty to Conspiracy to Distribute Controlled Substances online. Mr. Farrell had served approximately 75% of his sentence when this Court granted him Compassionate Release because FCI Sheridan consistently failed to provide him with necessary medical care. (Dkt 100). Mr. Farrell began his term of supervision on June 28, 2021.

1 After his release from custody, Mr. Farrell was able to address his health concerns
2 and then proceeded to create a productive life for himself. He attended Skagit Valley
3 Community College and graduated in December 2021 with an Associate Degree. That
4 same month he began working for Costal Software and Consulting as an IT specialist
5 developing integrated financial platforms. After living with his parents when released,
6 Mr. Farrell is now living in a place of his own. He goes to a gym every day in order to
7 promote and maintain his health. He also spends time hiking and has a pro-social group
8 of friends.

9 The Probation Office indicates that Mr. Farrell has not had any violations of
10 supervision and was transferred to a low risk administrative caseload in February. As a
11 “low risk” individual, he is no longer required to submit urine analysis testing and has
12 minimal contact with the Probation Office.

13 After only one year of supervision, Mr. Farrell has accomplished more than many
14 individuals achieve in two or three years. He has created exactly the kind of lifestyle
15 preferred by the probation office: he is employed full time in a career that offers
16 advancement and opportunity; has stable housing, maintains healthy relationships and
17 habits, and has not had any violations of his supervision whatsoever. Mr. Farrell has
18 demonstrated that he no longer needs the oversight and guidance of the probation office
19 and deserves early termination of his supervision.

20 DATED this 5th day of July, 2022.

21 Respectfully submitted,

22 *s/ Nancy Tenney*
23 Assistant Federal Public Defender
24 Attorney for Brian Richard Farrell
25 Office of the Federal Public Defender
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